REMARKS

A review of the claims indicates that:

A)   Claims 1—34 are cancelled.

B)   Claims 35—54 are previously presented.

C)   Claims 48 is currently amended.

Traversal of the §103 Rejections

Claims 35—54 stand rejected under 35 U.S.C. §103(a) as being obvious over U.S. Application 20040066527A1, hereinafter "Kloosterman" in view of U.S. Patent 7,020,837 B1 hereinafter "Kueny." In response, the Applicant respectfully traverses the rejection.

Claim 35 recites a processor-readable medium comprising processor-executable instructions for generating a PPML (personalized print markup language) document and translating the PPML document into a PDF (portable document format) document, the processor-executable instructions comprising instructions for:

- **marking a first PDF document to create a PPML template, wherein portions of the first PDF document are marked to become variables in the PPML template and other portions of the first PDF document are marked to become a background in the PPML template;**
- populating the PPML template with content and data, wherein the content and data are put into locations within the PPML template associated with the portions of the first PDF document marked to become variable, thereby creating the PPML document;
- parsing structures within the PPML document;
- generating a PDF document tree;
- populating the PDF document tree with objects identified when parsing the PPML document;
- configuring a second PDF document according to the PDF document tree; and
- printing the second PDF document.

The Applicant submits that the Kloosterman reference does not teach or suggest "marking a first PDF document to create a PPML template, wherein portions of the first PDF document are marked to become variables in the PPML template and other portions of the first PDF document are marked to become a background in the PPML template", as recited by Claim 35.

Generally, the Applicant submits that <u>Kloosterman fails to teach or suggest that the PPML/VDX document is created by marking a PDF document to create the PPML template</u>. Kloosterman teaches the creation of PPML documents using NexTreme®, but does not teach "marking a PDF document." But more particularly, the Applicant submits that <u>Kloosterman fails to teach the detail of marking portions of the PDF document to become variables and marking other portions of the PDF document to become background</u>. Kloosterman teaches variables within the PPML/VDX document, and putting a PDF file into such variables, *but not variable or background creation by marking a PDF*. The details of *how* NexTreme® creates a PPML document are not central to Kloosterman, *and are not disclosed*.

However, the Patent Office suggests that Kloosterman, at paragraphs [0032] through [0035] teaches marking a PDF to create a PPML template, wherein the marking results in variables and background in the PPML template. The Applicant respectfully disagrees that Kloosterman makes such a teaching, and asks that the Office reconsider.

The Applicant submits that Kloosterman teaches that a PPML/VDX document is created using an appropriate application, such as NexTreme® (see page 4, left side column, lines 7 to 13 from the top). The operation of the

PPML/VDX file created by the NexTreme® application is seen at paragraph [0032] lines 11—13. Kloosterman teaches that "The graphical artist creates a template consisting of static images, graphics and text as well as variable images, graphics and text in VDP composition". The Applicant observes that the output of operation of the NexTreme® application is the PPML/VDX document, which is essentially a PPML document enhanced by aspects of VDX. However, the Applicant submits that the NexTreme® is not central to the Kloosterman disclosure, and perhaps for that reason <u>does not explicitly teach any method by which NexTreme® creates the PPML/VDX document</u>.

The Office appears to suggest that the PDF files disclosed by Kloosterman at paragraphs [0033] to [0035] are analogous to the PDF file that the Applicant's claim recites is marked to become a PPML template. The Applicant respectfully disagrees, and suggests that the role of the PDF file, as recited by Claim 35, is substantially different from the role of the PDF files taught by Kloosterman.

Kloosterman does teach that the PPML/VDX file has variables (e.g. the graphical box into which a PDF picture of a Lexis or Ford is inserted). However, Kloosterman does not teach or suggest that the variables are created by marking elements in a PFD file. Thus, the PDF files put into PPML variables by Kloosterman are not suggestive of the method of making a PPML document by marking a PDF file, as recited by Claim 35.

Claim 35 recites that PDF document is marked up, thereby creating the PPML template. In contrast, Kloosterman teaches that the variable parts (e.g. the graphical box in the last several lines of [0032]) are associated with PDF elements (e.g. Yugo.pdf) that are inserted into the variable parts. For example, the graphical

box is filled with any of several PDF files, such as Lexus, Ford or Yugo. Thus, Claim 35 recites marking up the PDF document to create a PPML document. In contrast, Kloosterman teaches that PDF document (e.g. "Yugo") can be used as variable values to be inserted into variables (e.g. the graphical box) in the PPML/VDX document. (See Kloosterman at [0032].) The Applicant respectfully submits that the Kloosterman teaching of using PDFs as variable values does not teach or suggest marking a PDF document to create a PPML template.

The Office also appears to suggest that because Kloosterman teaches PPLM/VDX documents, and because those documents have variable and non-variable elements, that the documents were necessarily created in the manner recited by Claim 35. The Applicant respectfully disagrees, and submits that there are many ways to create PPML templates, including Kloosterman's suggestion of applications as NexTreme®, which do not teach or suggest the elements of Claim 35—such as marking a PDF to form variables and background.

In conclusion, the Applicant submits that Kloosterman's teaching of using PDF documents as variable values in a PPML document does not teach or suggest marking a PDF to create a PPML template. Moreover, the Applicant respectfully submits that the Kueny reference does not remedy the failings of Kloosterman. Accordingly, the Applicant respectfully requests that the Section 103 rejection be withdrawn.

Claims 36—41 depend from Claim 35 and are allowable due to their dependence from an allowable base claim. These claims are also allowable for their own recited features that, in combination with those recited in Claim 35, are neither disclosed nor suggested in references of record, either singly or in

combination with one another. Accordingly, the Applicant respectfully requests that the Section 103 rejection of these claims be removed.

Claims 42 and 49 were rejected under the same theory as Claim 35. Accordingly, the Applicant respectfully requests that the Section 103 rejection of these claims be removed.

Claims 43—48 and 50—54 depend from Claims 42 and 49 and are allowable due to their dependence from an allowable base claim. These claims are also allowable for their own recited features that, in combination with those recited in Claims 42 and 49, are neither disclosed nor suggested in references of record, either singly or in combination with one another. Accordingly, the Applicant respectfully requests that the Section 102 rejection of these claims be removed.

Conclusion

The Applicant submits that the claims as presented are in condition for allowance. Accordingly, the Applicant respectfully requests that a Notice of Allowability be issued. If the Patent Office's next anticipated action is not the issuance of a Notice of Allowability, the Applicant respectfully requests that the undersigned attorney be contacted to schedule an interview.

Respectfully Submitted,

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